

**From:** [Aaron M Ogletree](#)  
**To:** [General Counsel](#); [testingservices](#); [Grace C Clifford](#); [Opcuanet - Kelly King](#)  
**Cc:** [Anne O'Connor](#); [Meagan L Harless](#); [Michael Kalafatis](#)  
**Subject:** Ogletree v. Cleveland State University  
**Date:** Sunday, February 28, 2021 3:20:43 AM  
**Attachments:** [AO440.pdf](#)  
[civil-cover-sheet.pdf](#)  
[Complaint.pdf](#)  
[Emergency Motion for Preliminary Injunction.pdf](#)

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Kelly M. King  
Office of General Counsel  
2121 Euclid Avenue, AC 327  
Cleveland, OH 44115

**SUBJECT: NOTICE OF IMPENDING CIVIL ACTION & CONCURRENT MOTION FOR PRELIMINARY INJUNCTION**

Mrs. King,

Please take notice that today, February 8<sup>th</sup>, 2021, the Plaintiff in the above captioned action has transmitted to the Court for filing the attached Verified Complaint. Please find the attached "civil-cover-sheet," "AO440," and "Complaint." Additionally, please be advised that I am concurrently moving the Court for the entry of an emergency temporary preliminary injunction to halt the University's implementation and enforcement of its search policies. Please find the attached "Emergency Motion for Preliminary Injunction."

Given the University's silence and refusal to acknowledge my requests for settlement, as promised, I have transmitted the abovementioned documents to the U.S. District Court for filing to begin this action. While this entire dispute and the future litigation of this matter has been and certainly will only get more mentally exhausting and detrimental to my health, I am more resolved than ever to see this matter through to the end, no matter the outcome. While I remain open to negotiating a settlement, I have decided to refuse any offers until the Court has ruled on the preliminary injunction. It will be at this time that the strength of our cases can be assessed and all previously discussed remedies I plan on implementing will become fully available. Should the motion be granted, while not determinative of fact or law, it will certainly be extremely likely that I will prevail in this action. In that event, due to the extreme and extensive impact to my studies, health, and finances litigating this matter has caused, I will be demanding \$14,000.00 and significant concessions from the University for me to enter any settlement agreement and drop this action. I will be more than happy to provide the calculations for these damages and the medical bills from the Cleveland Clinic, LifeStance Health, and Rod Comforters on which these calculations are based. In the event my preliminary injunction is not granted, I will still remain open to settlement, however I am not certain what terms I will accept at this time. I remain confident that I can shift theories and make a persuasive argument to the Court which I will eventually prevail on. We can cross that bridge when we come to it, or we can continue to litigate this matter in Court at an exorbitant cost.

I hope this action serves as sufficient evidence of my seriousness to go forward with all previously described remedies. I look forward to your response and seeing you in Court. I look

forward to learning more about law and litigation throughout this action, it will certainly be a privilege no matter the outcome. The matters of law we are litigating are quite interesting and the potential to set new federal precedent, in either direction, is quite enticing. As previously discussed, my initial discovery requests will be forthcoming. Do not destroy any potential evidence for this action.

As always, thank you very much for your time.

Cordially,

Aaron M. Ogletree (2643516)